



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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December 29, 2020

**By ECF**

The Honorable Laura Taylor Swain  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Noel, et al. v. City of New York, 1:15-CV-05236 (LTS)(KHP)

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendant the City of New York in the above-referenced matter. I am writing to request an extension of time to file the City's reply to Plaintiffs' opposition to the City's cross-motion for summary judgment, that is currently due January 14, 2021. The City is seeking a four week extension, making the new deadline February 11, 2021. The City needs this additional time due to a variety of reasons, including holiday vacation schedules, mandatory furlough days for the litigation team and many of our client contacts, the need to respond to the amicus brief filed by the Lawyer's Committee for Civil Rights Under Law, unexpected work related conflicts, and the unfortunate and unexpected recent loss of a litigation team member's parent. The City's response to the amicus brief filed by the Lawyer's Committee for Civil Rights Under Law will likewise will be filed on February 11, 2021. Plaintiffs' sur-reply, now due February 12, 2021 will be extended until March 12, 2021. This is the City's first request for an extension of time on its reply papers. Plaintiffs have consented to this request.

Thank you for your consideration of this matter. I hope you have a happy and healthy new year.

Respectfully submitted,

/s/

Melanie V. Sadok  
Assistant Corporation Counsel

cc: Attorneys for Plaintiffs (via ECF)